

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

No. 1:19-CR-10080-NMG

[PROPOSED] PROTECTIVE ORDER

The Court ORDERS as follows:

1. This Order applies to all documents produced by the University of Southern California or Georgetown University that reference college applicants and college students other than the children of the Defendants and their indicted co-conspirators (collectively the “Non-Party Students”).
2. If any such documents are used as Exhibits at trial, the following information regarding the Non-Party Students will be redacted:
 - a. Name
 - b. Names of parents
 - c. Name of parents’ employer
 - d. Street address
 - e. Email address
 - f. Phone number
 - g. Date of birth

- h. Social Security number or equivalent
- 3. The names for all Non-Party Students and their parents shall be replaced with an alpha-numeric identifier that shall remain consistent across all Exhibits. The name of the parent's employer may be replaced with a generic industry identifier if necessary and shall otherwise be redacted. The government and the Defendants are ordered to cooperate in redacting Exhibits and ensuring the consistency of the alpha-numeric identifiers.
- 4. The government and the Defendants will jointly create a "key" for the alpha-numeric identifiers. The key shall be provided to the Court. Any witness who testifies at trial will be able to review the key during their testimony but will not be permitted to retain a copy of the key. Witnesses will be instructed not to disclose the names of the Non-Party Students during their testimony.
- 5. For reference, the clerk shall maintain a set of unredacted Exhibits during the trial. These unredacted Exhibits shall not be used without further order of the Court.

DATED _____